

### **REMARKS**

Claims 1-56 are pending in the application. Claims 1-56 have been rejected. The Specification has been amended. Claims 1, 3-11, 17, 21-24, 29, 31, 33-39, 45, and 49-51 have been amended. No new matter has been added.

### **Examiner Interview**

An Examiner Interview was conducted by telephone on April 3, 2006. During the Interview the Examiner expressed his concern over the indefiniteness of the claims leading to the 35 USC 101 rejection. Applicants would like to thank the Examiner for his comments. The claims have been amended to clarify what is being claimed.

### **Amendment to Specification**

The Examiner objected to the Abstract. The Abstract has been amended as suggested by the Examiner.

### **Amendment to Claims**

Claims 1, 3-11, 17, 21-24, 29, 31, 33-39, 45, and 49-51 have been amended to better clarify the subject matter being claimed.

### **Claim Rejections – 35 USC § 101**

Claims 1-2, 6-10, 29-30, and 34-38 are rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Applicants respectfully submit that the rejection cannot be applied to the claims as amended.

Of the cited claims, claims 1 and 29 are independent and Claims 2, 6-10, 30, and 34-38 depend from either claim 1 or 29. Independent claims 1 and 29 have been amended to clarify the subject matter being claimed. Claims 1 and 29 now recite that a function definition is provided or obtained and then description information about the function is created from the function definition.

Applicants respectfully disagree with the Examiner's assertion that "description information" is an abstract idea and the claimed method does not provide a tangible result. The description information enables the translation of a call to the function in the first language into a call to a corresponding function in a second language without requiring processing of the definition of the function. As such the created description information is not an abstract entity but a tangible useful result, namely the enabling of the translation of a call in a first language into a call to a corresponding function in a second language without requiring processing of the definition of the function during the translation. That is, by using the description information, access to the definition of the function in the first language is not required when translating each instance of a call to the function in the first language. This is also supported in Claims 11, 21, 39, and 49 wherein the description information is used in translating a call to a function in a first language to a corresponding function in a second language without requiring processing of the definition of the function. Therefore "description information" is a useful, concrete and tangible result and is not an abstract idea.

Claims 2, 6-10, 30, and 34-38 depend from claims 1 and 29 and incorporate each and every element of amended claims 1 and 29.

In view of the above arguments, Applicants respectfully request that the rejection to claims 1-2, 6-10, 29-30, and 34-38 under 35 U.S.C. 101 be removed and the claims passed to allowance.

#### **Claim Rejections – 35 USC § 112**

Claims 1, 11, 21, 29, 39 and 49 rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically the Examiner asserts the term "sufficient" is indefinite. The Examiner has also rejected the claims depending from 1, 11, 21, 29, 39 and 49 based on the term "sufficient."

Claims 1, 11, 21, 29, 39, and 49 have been amended to clarify the claim language. The claims now read "wherein the description information enables translation of a call to the function in the first language into a call to a corresponding function in the second language without

requiring processing of the definition of the function.” The rest of the claims depend from claims 1, 11, 21, 29, 39, and 49 and therefore incorporate each and every element of amended claims 1, 11, 21, 29, 39, and 49.

In view of the amendments to claims, Applicants respectfully request that the rejection to claims 1-56 under 35 U.S.C. 112, second paragraph, be removed and the claims passed to allowance.

### **Claim Rejections – 35 USC § 102**

Claims 1-7, 11-13, 17, 20, 29-35, 39, 40-41, 45 and 48 are rejected under 35 U.S.C. 102(b) as being anticipated by Shannon et al., “Mapping the Interface Description Language Type Model in C”, November 1989, IEEE Transactions on Software Engineering, Vol. 15. No. 11 (hereinafter Shannon). Applicants respectfully request reconsideration of this rejection.

Claims 1, 3-7, 11, 17, 29, 31, 33-35, 39, and 45 have been amended to clarify what is being claimed. Claims 2, 12, 13, 20, 30, 32, 40-41, and 48 depend from the amended claims and thus incorporate each and every element of the amended claims.

Shannon fails to *disclose* each and every element of claims 1-7, 11-13, 17, 20, 29-35, 39, 40-41, 45 and 48. Shannon does not disclose creating description information about a function from the definition of a function associated with the first language which enables the translation of a call to the function in the first language into a call to a corresponding function in a second language without requiring processing of the definition of the function as set forth in the amended claims. The use of the description information of the present invention eliminates the need for processing of the definition of a function during the translation of a call to the function in a first language into a call to a corresponding function in a second language. This is a concept not address in the Shannon. As Applicants have states before, translating a call to a function is not the same as translating the function itself. Furthermore, the present invention allows for translation of a call to a function *without requiring processing of the definition of the function*. The creation and use of description information as set forth in claims 1-7, 11-13, 17, 20, 29-35, 39, 40-41, 45 and 48 allows for this benefit. This is not discussed in Shannon. In view of this clarification, applicants believe that the Examiner’s rejection based on Shannon no longer applies.

Applicants are uncertain as to what the Examiner believes Shannon discloses. The language the Examiner has attempted to link together is from different sections of Shannon and refers to different subject matter in Shannon. Applicants are unsure if the Examiner is asserting that IDL is the first language or the description information. As such, Applicants maintain that Shannon fails to *disclose* each and every element of claims 1-7, 11-13, 17, 20, 29-35, 39, 40-41, 45 and 48.

In view of the above amendments and arguments, Applicants respectfully request that the rejection to claims 1-7, 11-13, 17, 20, 29-35, 39, 40-41, 45 and 48 under 35 U.S.C. 102(b) be removed and the claims passed to allowance.

#### **Claim Rejections – 35 USC § 103**

Claims 8-10, 14-16, 18-19, 36-38, 42-44 and 46-47 are rejected under 35 U.S.C. 103(a) as being unpatentable over Shannon et al., “Mapping the Interface Description Language Type Model in C”, November 1989, IEEE Transactions on Software Engineering, Vol. 15, No. 11, in view of Bjarne Stroustrup, “the C++ Programming Language”, 2<sup>nd</sup> Edition, copyright 1991 (hereinafter Stroustrup). Applicants respectfully traverse the rejection.

Claims 8-10, 14-16, 18-19, 36-38, 42-44 and 46-47 depend from amended independent claims 1, 11, 29, and 39 and as such incorporate each and every element of amended claims 1, 11, 29 and 39. For the same reasons as set forth above in response to the 35 U.S.C. 102 rejection, Shannon fails to teach or suggest each and every element of amended claims 1, 11, 29 and 39. Accordingly, Shannon fails to teach or suggest each and every element of claims 8-10, 14-16, 18-19, 36-38, 42-44 and 46-47. The addition of Stroustrup fails to cure these deficiencies. Therefore, the combination of Shannon and Stroustrup fail to teach or suggest each and every element of claims 8-10, 14-16, 18-19, 36-38, 42-44 and 46-47.

In view of the above amendments and arguments, Applicants submit that the subject matter of claims 8-10, 14-16, 18-19, 36-38, 42-44 and 46-47 is not obvious and respectfully request that the rejection to claims 8-10, 14-16, 18-19, 36-38, 42-44 and 46-47 under 35 U.S.C. 103 be removed and the claims passed to allowance.

**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Dated: April 6, 2006

Respectfully submitted,

By

  
James McKenzie

Registration No.: 51,146

LAHIVE & COCKFIELD, LLP

28 State Street

Boston, Massachusetts 02109

(617) 227-7400

(617) 742-4214 (Fax)

Attorney/Agent For Applicant